US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DO 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
9/22/99	16001	01	1015	Safety-Kleen(PPM), Inc.

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
U. S. Environmental Protection Agency Environmental Science Center 701 Mapes Road Ft. Meade, MD 20755-5350	4105 Whitaker Ave. Philadelphia, PA 19124

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☑ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to *(Check appropriate blocks)*:

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
NAME		NAME	
Charles T. Hufnagel Jr.		Dan B. Glenn	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Environmental Engineer	9/22/99	Facility Manager	9/22/99

EPA Form 7740-3 (12-82)

INSPECTION FILE

US ENVIRONMENTAL PROTECTION AGEN
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	Safety-Kleen (PPM), Inc.
9/22/99	16001	01	
3. INSPECTOR NAME			4. FIRM ADDRESS
Charles T. Hufnagel Jr.			4105 Whitaker Ave. Philadelphia, PA 19124
5. INSPECTOR ADDRESS			6. CHIEF EXECUTIVE OFFICER NAME
U. S. Environmental Protection Agency Environmental Science Center 701 Mapes Road Ft. Meade, MD 20755-5350			7. TITLE

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified meil, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
I have received and read the notice		
SIGNATURE		NAME
NAME: Dan B. Glenn		TITLE
TITLE: Facility Manager	DATE SIGNED: 9/22/99.	ADDRESS

EPA Form 7740-4 (12-82)

INSPECTION FILE

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval expires 10-31-92

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	Safety-Kleen (PPM), Inc.
9/22/99	16001	01	

3. INSPECTOR ADDRESS

U. S. Environmental Protection Agency
Environmental Science Center
701 Mapes Road
Ft. Meade, MD 20755-5350

4. FIRM ADDRESS

4105 Whitaker Ave.
Philadelphia, PA 19124

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
11	Photographs Warehouse Inventory Report (9/27/99 C#) Pre-Audit Package 1997, 1998 Annual Reports

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☐

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
NAME		NAME	
Charles T. Hufnagel Jr.		DW B. Glenn	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Environmental Engineer	9/22/99	Facility Manager	9/22/99

EPA Form 7740-1 (12-82)

INSPECTOR'S FILE

US ENVIRONMENTAL PROTECTION AGEN
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved
OMB No. 2070-0007
Expires 3-31-88

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	Safety-Kleen (PPM), Inc.
9/22/99	16001	01	

3. INSPECTOR ADDRESS
U. S. Environmental Protection Agency
Environmental Science Center
701 Mapes Road
Ft. Meade, MD 20755-5350

4. FIRM ADDRESS
4105 Whitaker Ave.
Philadelphia, PA 19124

INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
11	Photographs Warehouse Inventory Report (9/20/99) and any customer related information

ACKNOWLEDGEMENT BY CLAIMANT

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

INSPECTOR SIGNATURE		CLAIMANT SIGNATURE	
NAME		NAME	
Charles T. Hufnagel Jr.		Dan B. Green	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Environmental Engineer	9/22/99	Facility Manager	9/22/99

EPA Form 7740-2 (12-82)

INSPECTION FILE

safety-kleen®

PCB ANNUAL REPORT

Safety-Kleen (PPM), Inc.
4105 Whitaker Avenue
Philadelphia, Pennsylvania 19124
EPA ID #PAD981113749
Commercial Storer & Disposer

Calendar Year Covered: 01/01/98 thru 12/31/98

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1. Amount of PCB waste (kg) in the following items in **storage at the facility at the beginning of the calendar year:**

   A) PCB Large Low and High Voltage Capacitors 2328 kg

   B) PCB Article Containers:

      1) PCB Capacitors: 27630 kg

   C) PCB Transformers(>500 ppm): 16818 kg

   D) Bulk:

      1) PCB Mineral Oil: 16310 kg

      2) PCB Water: 0 kg

   E) PCB Containers:

      1) PCB Mineral Oil: 23039 kg

      2) PCB Debris: 7816 kg

      3) PCB Water: 7606 kg

      4) PCB Empty Drums: 310 kg

      5) PCB Sludge: 670 kg

2. Amount of PCB waste (kg) in the following items **received or generated by the facility during the calendar year:**

A) PCB Large Low and High Voltage Capacitors:

1) Received: 6987 kg

2) Generated: 0 kg

B) PCB Article Containers:

1) PCB Capacitors:

a) Received: 81743 kg

b) Generated: 0 kg

C) PCB Transformers (>500 ppm):

1) Received: 315390 kg

2) Generated: 0 kg

D) Bulk:

1) PCB Mineral Oil:

a) Received: 744773 kg

b) Generated: 0 kg

2) PCB Water:

a) Received: 47450 kg

b) Generated: 0 kg

E) PCB Containers:

1) PCB Mineral Oil:

a) Received: 245133 kg

b) Generated: 10426 kg

2) PCB Debris:

a) Received: 165429 kg

b) Generated: 7787 kg

3) PCB Water:

a) Received: 39561 kg

b) Generated: 3472 kg

4) PCB Empty Drums:

a) Received: 34702 kg

b) Generated: 1332 kg

5) PCB Sludge:

a) Received: 8079 kg

b) Generated: 0 kg

3. Amount of PCB waste (in kg) in the following items **transferred to another facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 9315 kg

B. PCB Article Containers:

1) PCB Capacitors: 93089 kg

C. PCB Transformers(>500 ppm): 261133 kg

D. Bulk:

1) PCB Mineral Oil: 746731 kg

2) PCB Water: 47450 kg

E. PCB Containers:

1) PCB Mineral Oil: 233205 kg

2) PCB Debris: 163318 kg

3) PCB Water: 48552 kg

4) PCB Empty Drums: 28090 kg

5) PCB Sludge: 8749 kg

4. Amount of PCB waste (in kg) in the following items that was **disposed of at the facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 0 kg

B. PCB Article Containers

1) PCB Capacitors: 0 kg

C. PCB Transformers(>500 ppm): 0 kg

D. Bulk:

1) PCB Mineral Oil: 0 kg

2) PCB Water: 0 kg

E. PCB Containers:

1) PCB Mineral Oil: 0 kg

2) PCB Debris: 0 kg

3) PCB Water: 0 kg

4) PCB Empty Drums: 0 kg

5) PCB Sludge: 0 kg

5. Total number of the following items **in storage at the beginning of the calender year:**

A. PCB Large Low and High Voltage Capacitors: 74

B. PCB Article Containers:

1) PCB Capacitors: 95

C. PCB Transformers(>500 ppm): 52

D. Bulk:

1) PCB Mineral Oil: 4797 gal

2) PCB Water: 0 gal

E. PCB Containers:

1) PCB Mineral Oil: 116

2) PCB Debris: 42

3) PCB Water: 39

4) PCB Empty Drums: 13

5) PCB Sludge: 3

6. Total number of the following **received or generated by the facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors:

1) Received: 204

2) Generated: 0

B. PCB Article Containers:

1) PCB Capacitors:

a) Received: 383

b) Generated: 0

C. PCB Transformers (>500 ppm):

1) Received: 572

2) Generated: 0

D. Bulk:

1) PCB Mineral Oil:

a) Received: 219051 gal

b) Generated: 0 gal

2) PCB Water:

a) Received: 13956 gal

b) Generated: 0 gal

E. PCB Containers:

1) PCB Mineral Oil:

a) Received: 1280

b) Generated: 60

2) PCB Debris:

a) Received: 1029

b) Generated: 51

3) PCB Water:

a) Received: 203

b) Generated: 20

4) PCB Empty Drums:

a) Received: 1915

b) Generated: 74

5) PCB Sludge:

a) Received: 42

b) Generated: 0

7. Total number of the following items **transferred to another facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 278

B. PCB Article Containers:

1) PCB Capacitors: 399

C. PCB Transformers(>500 ppm): 385

D. Bulk:

1) PCB Mineral Oil: 219627 gal

2) PCB Water: 13956 gal

E. PCB Containers:

1) PCB Mineral Oil: 1212

2) PCB Debris: 1010

3) PCB Water: 251

4) PCB Empty Drums: 1542

5) PCB Sludge: 45

8. Total number of the following items **disposed of at the facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 0

B. PCB Article Containers:

1) PCB Capacitors: 0

C. PCB Transformers(>500 ppm): 0

D. Bulk:

1) PCB Mineral Oil: 0 gal

2) PCB Water: 0 gal

E. PCB Containers:

1) PCB Mineral Oil: 0

2) PCB Debris: 0

3) PCB Water: 0

4) PCB Empty Drums: 0

9. Total weight (in kg) of the following items **remaining in storge at the facility at the end of the calender year:**

A. PCB Large Low and High Voltage Capacitors: 0 kg

B. PCB Article Containers:

1) PCB Capacitors: 16272 kg

C. PCB Transformers(>500 ppm): 75023 kg

D. Bulk:

1) PCB Mineral Oil: 16997 kg

2) PCB Water: 0 kg

E. PCB Containers:

1) PCB Mineral Oil: 39473 kg

2) PCB Debris: 17606 kg

3) PCB Water: 2032 kg

4) PCB Empty Drums: 8296 kg

5) PCB Sludge: 0 kg

10. Total number of the following items **remaining in storage at the facility at the end of the calender year:**

A. PCB Large Low and High Voltage Capacitors: 0

B. PCB Article Containers:

1) PCB Capacitors: 79

C. PCB Transformers(>500 ppm): 239

D. Bulk:

1) PCB Mineral Oil: 4999 gal

2) PCB Water: 0 gal

E. PCB Containers:

1) PCB Mineral Oil: 191

2) PCB Debris: 112

3) PCB Water: 11

4) PCB Empty Drums: 460

5) PCB Sludge: 0

Please note that some items may not balance due to seperation/combination processes performed at the facility.

LAIDLAW ENVIRONMENTAL SERVICES

PCB ANNUAL REPORT

Laidlaw Environmental Services (Tucker), Inc.
4105 Whitaker Avenue
Philadelphia, Pennsylvania 19124
EPA ID #PAD981113749
Commercial Storer & Disposer

Calendar Year Covered: 01/01/97 thru 12/31/97

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1. Amount of PCB waste (kg) in the following items in **storage at the facility at the beginning of the calendar year:**

   A) PCB Large Low and High Voltage Capacitors 4534 kg

   B) PCB Article Containers:

      1) PCB Capacitors: 21157 kg

   C) PCB Transformers (>500 ppm): 51837 kg

   D) Bulk:

      1) PCB Mineral Oil: 161180 kg

      2) PCB Water: 0 kg

   E) PCB Containers:

      1) PCB Mineral Oil: 24389 kg

      2) PCB Debris: 19793 kg

      3) PCB Water: 3938 kg

      4) PCB Empty Drums: 7585 kg

      5) PCB Sludge: 1968 kg

2. Amount of PCB waste (kg) in the following items **received or generated by the facility during the calendar year:**

   A) PCB Large Low and High Voltage Capacitors:

      1) Received: 34381 kg

PPM INC
4105 Whitaker Avenue Philadelphia, Pennsylvania 19124
215.425.5144 Fax 215.425.0730

2) Generated: 0 kg

B) PCB Article Containers:

1) PCB Capacitors:

a) Received: 108067 kg

b) Generated: 0 kg

C) PCB Transformers (>500 ppm):

1) Received: 315764 kg

2) Generated: 0 kg

D) Bulk:

1) PCB Mineral Oil:

a) Received: 1895986 kg

b) Generated: 7694 kg

2) PCB Water:

a) Received: 0 kg

b) Generated: 0 kg

E) PCB Containers:

1) PCB Mineral Oil:

a) Received: 220803 kg

b) Generated: 46409 kg

2) PCB Debris:

a) Received: 148338 kg

b) Generated: 198101 kg

3) PCB Water:

a) Received: 76394 kg

b) Generated: 32859 kg

4) PCB Empty Drums:

a) Received: 14188 kg

b) Generated: 3242 kg

5) PCB Sludge:

a) Received: 10301 kg

b) Generated: 10953 kg

3. Amount of PCB waste (in kg) in the following items **transferred to another facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 36575 kg

B. PCB Article Containers:

1) PCB Capacitors: 101611 kg

C. PCB Transformers(>500 ppm): 353026 kg

D. Bulk:

1) PCB Mineral Oil: 2039663 kg

2) PCB Water: 0 kg

E. PCB Containers:

1) PCB Mineral Oil: 268941 kg

2) PCB Debris: 359630 kg

3) PCB Water: 105592 kg

4) PCB Empty Drums: 24940 kg

5) PCB Sludge: 22553 kg

4. Amount of PCB waste (in kg) in the following items that was **disposed of at the facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 0 kg

B. PCB Article Containers

1) PCB Capacitors: 0 kg

C. PCB Transformers(>500 ppm): 0 kg

D. Bulk:

1) PCB Mineral Oil: 8888 kg

2) PCB Water: 0 kg

E. PCB Containers:

1) PCB Mineral Oil: 0 kg

2) PCB Debris: 0 kg

3) PCB Water: 0 kg

4) PCB Empty Drums: 0 kg

5) PCB Sludge: 0 kg

5. Total number of the following items **in storage at the beginning of the calender year:**

A. PCB Large Low and High Voltage Capacitors: 100

B. PCB Article Containers:

1) PCB Capacitors: 88

C. PCB Transformers(>500 ppm): 126

D. Bulk:

1) PCB Mineral Oil: 47406 gal

2) PCB Water: 0 gal

E. PCB Containers:

1) PCB Mineral Oil: 128

2) PCB Debris: 80

3) PCB Water: 21

4) PCB Empty Drums: 421

5) PCB Sludge: 7 kg

6. Total number of the following **received or generated by the facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors:

1) Received: 713

2) Generated: 0

B. PCB Article Containers:

1) PCB Capacitors:

a) Received: 469

b) Generated: 0

C. PCB Transformers (>500 ppm):

1) Received: 524

2) Generated: 0

D. Bulk:

1) PCB Mineral Oil:

a) Received: 557643 gal

b) Generated: 2263 gal

2) PCB Water:

a) Received: 0 gal

b) Generated: 0 gal

E. PCB Containers:

1) PCB Mineral Oil:

a) Received: 1068

b) Generated: 254

2) PCB Debris:

a) Received: 698

b) Generated: 138

3) PCB Water:

a) Received: 384

b) Generated: 157

4) PCB Empty Drums:

a) Received: 784

b) Generated: 178

5) PCB Sludge:

a) Received: 41

b) Generated: 56

7. Total number of the following items **transferred to another facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 739

B. PCB Article Containers:

1) PCB Capacitors: 462

C. PCB Transformers(>500 ppm): 598

D. Bulk:

1) PCB Mineral Oil: 599901 gal

2) PCB Water: 0 gal

E. PCB Containers:

1) PCB Mineral Oil: 1341

2) PCB Debris: 874

3) PCB Water: 523

4) PCB Empty Drums: 1370

5) PCB Sludge: 101

8. Total number of the following items **disposed of at the facility during the calender year:**

A. PCB Large Low and High Voltage Capacitors: 0

B. PCB Article Containers:

1) PCB Capacitors: 0

C. PCB Transformers(>500 ppm): 0

D. Bulk:

1) PCB Mineral Oil: 2614 gal

2) PCB Water: 0 gal

E. PCB Containers:

1) PCB Mineral Oil: 0

2) PCB Debris: 0

3) PCB Water: 0

4) PCB Empty Drums: 0

9. Total weight (in kg) of the following items **remaining in storge at the facility at the end of the calender year:**

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B. PCB Article Containers:

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1) PCB Mineral Oil: 16310 kg

2) PCB Water: 0 kg

E. PCB Containers:

1) PCB Mineral Oil: 23039 kg

2) PCB Debris: 7816 kg

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10. Total number of the following items **remaining in storage at the facility at the end of the calender year:**

A. PCB Large Low and High Voltage Capacitors: 74

B. PCB Article Containers:

1) PCB Capacitors: 95

C. PCB Transformers(>500 ppm): 52

D. Bulk:

1) PCB Mineral Oil: 4797 gal

2) PCB Water: 0 gal

E. PCB Containers:

1) PCB Mineral Oil: 116

2) PCB Debris: 42

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Please note that some items may not balance due to seperation/combination processes performed at the facility.